

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of)	
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Elimination of Main Studio Rule)	MB Docket No. 17-106
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To: The Commission

**COMMENTS OF THE
CRAWFORD BROADCASTING COMPANY**

Crawford Broadcasting Company (õCrawfordö) and its affiliates are licensees of 14 AM and 9 FM commercial broadcast stations¹. As such, we have great interest in the Commission's efforts to eliminate the main studio rule, and we applaud the Commission's efforts in this matter. We tender the following comments in response to the Notice of Proposed Rulemaking.

A. A Local Main Studio is Unnecessary for the Public to Participate in Programming

Many of Crawford's stations program õGod and Countryö formats consisting of either religious talk, political talk or a combination of the two. These stations feature live talk including on-air guests and callers. As such, our stations are often plugged into the local community much more than stations programming music and other entertainment formats. Voices of individuals from our communities are heard on many of our stations on a daily basis.

It has been our experience in recent years that it is seldom necessary for people to come to our studios in order to participate in our programming. Just about anyone can call in by telephone and gain access, and others make use of audio-over-IP codecs and other devices to convey programming from their locations to our studios. Even some of our on-air hosts do not come into our studios daily but rather do their live shows from their homes using such codecs and other devices.

Further, those who do not wish to lend their actual voices to programming often participate in on-air discussions via social media, email and text messages.

The point is, it is no longer necessary or perhaps even desirable for some employees, hosts, guests and members of the public to come to the main studio of a broadcast station in order to participate

¹ Crawford AM affiliates include KBRT, Costa Mesa, CA; KNSN, San Diego, CA; KCBC, Manteca, CA; KKPZ, Portland, OR; KLZ/KLDC, Denver, CO; KLTT, Commerce City, CO; KLVZ, Brighton, CO; WDCX-FM/WDCZ, Buffalo, NY; WDCX, Rochester, NY; WDJC-FM/WYDE/WXJC/WXJC-FM, Birmingham, AL; WXJC-FM, Cordova, AL; WMUZ, Detroit, MI; WEXL, Royal Oak, MI; WRDT, Monroe, MI; WPWX, Hammond, IN; WYCA, Crete, IL; WSRB, Lansing, IL; and WYRB, Genoa, IL.

in the on-air product. While some individuals still opt to come into the studio rather than utilizing some other means of contact, those individuals certainly have other options.

B. A Local Main Studio is Not Necessary for Public File Access

Prior to enactment of the online public inspection file (OPIF) rule for radio, it was a very rare thing indeed for anyone to come to one of our stations to look at the public file. Now that the OPIF rule is in place, there is no reason for a member of the public to pay a personal visit to most stations's studios to look at the public file.

For those stations that have not for whatever reason transitioned to OPIF from locally-maintained hard copies, we would suggest that the existing main studio criteria continue to apply. It is, in our experience, a simple matter to transition to OPIF, and there is little reason not to make that transition.

C. Maintaining a Local Main Studio is Often a Financial Burden

It is not uncommon for the principal community of a radio station to be located some distance from a population center from which revenue, personnel and programming can be derived. In those cases and where the population center is outside the defined requirement for main studio location, it is necessary for broadcasters to construct, maintain and staff a main studio that is remote from the population center. There are significant and sometimes crippling costs associated with this requirement.

For example, a leasehold or owned piece of real estate with a suitable building must be secured in or near the principal community. Rent, mortgage, taxes, utilities, repair and maintenance and other routine costs go along with such property. Then the actual studio must be built and adequately equipped for broadcast, which can require a significant investment. A link of some sort must be established between this main studio and the transmitter site.

Based on our own experience, base costs associated with a separate local main studio can easily run \$60,000² or more per year with a small space and minimal staffing, a significant amount by any measure.

D. Stations Should be Required to Maintain a Local Telephone Number in their Principal Communities

We believe that it is important that residents of the principal community should be able to contact a station licensed to that community without incurring toll charges. This would present little burden to the licensee, as options for toll-free or foreign exchange numbers are numerous today.

We do not believe that it is necessary for such telephone numbers to be continually staffed during normal business hours. It is common business practice outside of broadcasting to employ automated answering/call-routing or "auto attendant" mechanisms and not have phones staffed at all. As long as messages ultimately reach station personnel, we see no reason that the same mechanisms cannot be employed in radio.

² In one example market where Crawford operates and staffs a separate local main studio to comply with the existing main studio rule: Rent: \$8,100; phone and internet (internet bandwidth is used for STL): \$6,000; employee compensation and expenses: \$47,000.

With regard to posting of station telephone numbers, the station website is an obvious choice. In our experience, this is where most callers go first to find the phone number and other contact information for any business.

Respectfully submitted,
CRAWFORD BROADCASTING COMPANY

A handwritten signature in black ink, appearing to read 'W. Cris Alexander', with a stylized, cursive script.

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